



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**  
Office of Child Care



# OCC Monitoring Process: Cycle 2

A Guide for State and Territory Lead Agencies

November 9, 2021

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## I. About This Guide

The purpose of this document is to provide States and Territories with the information and resources needed to perform monitoring processes within the Office of Child Care (OCC) Monitoring System. The guide includes background information about the design and structure of the system, instructions for conducting monitoring activities, definitions for key terms and acronyms, and blank and completed examples of monitoring forms.

Several types of callouts are used throughout this guide to improve the guide’s usefulness:



**ON THE GROUND** – These callouts provide suggestions and lessons learned from those involved in the monitoring pilots and in formal monitoring.



**LEARN MORE** – These callouts provide links to trainings and tipsheets where additional information may be accessed.



**ADDITIONAL INFO** – These callouts reference details and other useful tools located within the appendices.



**TEAM TIP** – These callouts include helpful tips for members of the State teams.

Appendices and other documents are shown in italicized text for easy identification within the narrative.

Processes and resources described and shared in this guide are current as of the date of publication (Nov. 9, 2021) and are effective for Monitoring Cycle #2, which covers the period from Oct. 1, 2021, through Sept. 30, 2024. As periodic updates and clarifications are made, the publication date will be updated to reflect the latest substantive revision date.

The resources included in Appendix B of this guide (tipsheets, training materials, etc.) will be updated periodically. Readers should always download resources from the latest version of the guide to ensure use of up-to-date materials.

*OCC Monitoring Process: A Guide for State and Territory Lead Agencies* was written by WRMA, Inc., under the direction of OCC’s Oversight and Accountability Division.



### ADDITIONAL INFO

*Appendix A, Commonly Used Terms and Acronyms* provides definitions and cross-references for terms and acronyms used in this guide and throughout the monitoring process.

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# II. The OCC Monitoring System

## Background

The Child Care and Development Fund (CCDF) Final Rule at 45 CFR § 98.90, *Subpart J—Monitoring, Noncompliance and Complaints*, provides the Secretary of the Department of Health and Human Services the authority to monitor States<sup>1</sup> for compliance with the Child Care and Development Block Grant (CCDBG) Act of 2014, the CCDF Final Rule, and the State’s approved CCDF Plan. Traditionally, OCC implemented this requirement through review and approval of CCDF Plans, including Plan amendments, and through ongoing oversight. In 2016, OCC expanded its monitoring efforts by developing a system for in-depth monitoring of State compliance with CCDF regulations.

OCC’s formal monitoring started with the approval of the 2019-2021 triennial CCDF Plans. The in-depth monitoring process will review each State’s policies, procedures, and practices on the ground against CCDF regulations and against what is written in the State’s approved Plan.

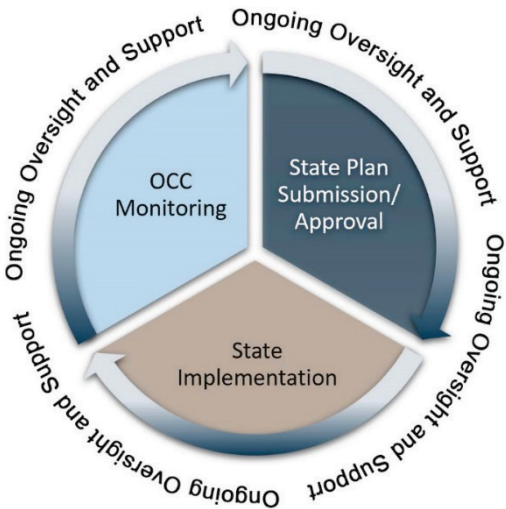
## Development

Development of the monitoring system was guided by three key principles to ensure effectiveness:

1. **Transparency:** OCC engaged the States so they had a voice in the development of the monitoring system and understood the associated expectations.
2. **Support for the States:** OCC committed to making monitoring useful to the States, as well as supporting them in operating CCDF systems that comply with the CCDF regulations. Rather than building a punitive system, OCC envisioned a monitoring system that supported the identification of technical assistance (TA) needs.
3. **Efficiency in the development and execution of the monitoring system:** OCC thought strategically about how to use existing grantee data, identifying gaps in data or other necessary documentation and synthesizing data and documentation prior to the site visit to minimize duplicative requests.

The development of the monitoring system was divided into two phases. The first phase included conversations with CCDF Lead Agency stakeholders and national experts in other monitoring systems, along with pilot visits conducted with three States. The input gathered during that phase was essential to developing the draft monitoring process. Feedback and

FIGURE 1



<sup>1</sup> Within this document, the term “State” has the following meaning as established in CCDF Final Rule (45 CFR § 98.02): “State means any of the States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands of the United States, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, and includes Tribes unless otherwise specified.” Currently, OCC’s monitoring process does not apply to Tribes.



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lessons learned from the first phase were incorporated into the second phase, which included conducting pilot site visits in seven States to test the draft monitoring processes and data collection tools in a real-world environment. The feedback and lessons learned from this pilot phase contributed to the design and implementation of the fully operating monitoring system in federal fiscal year (FFY) 2019.

Following the launch of the OCC Monitoring System in FFY 2019, OCC continued to work to include feedback and lessons learned throughout Cycle 1 into the process. Since the process has been streamlined along the way, there are no major process changes for Cycle #2. OCC Monitoring Teams will continue to coach States through the process and to seek feedback throughout all three phases of monitoring.

## Goals

The purposes of the OCC Monitoring System are to:

1. Ensure compliance with CCDF regulations and approved CCDF Plans;
2. Identify technical assistance needs to meet CCDF requirements; and
3. Identify promising practices to inform continuous quality improvement.

## Cohorts and Cycles

TABLE 1

States are divided into three monitoring cohorts with one-third of the States visited annually; one cohort is visited every year. Each three-cohort monitoring cycle aligns with a CCDF Plan Period. The monitoring cohorts and the dates for each cohort within Monitoring Cycle #2 are provided in

**Table 1 and 2.**

| States          | OCC Monitoring Cycle #2 |
|-----------------|-------------------------|
| Cohort 1 States | 10/1/21 – 9/30/22       |
| Cohort 2 States | 10/1/22 – 9/30/23       |
| Cohort 3 States | 10/1/23 – 9/30/24       |

The State cohort assignments mirror those used for the improper payment/error rate reviews but are shifted by one year so that no State is required to undergo an error rate review and monitoring in the same federal fiscal year.

## Sub-Cohorts

States with visits during the same part of the fiscal year (usually a calendar quarter) are called a sub-cohort. States within each sub-cohort undergo preparatory training together. (See *Section III. Monitoring Process Overview* below.)

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**TABLE 2**

| Cohort 1 States | Region | Cohort 2 States      | Region | Cohort 3 States | Region |
|-----------------|--------|----------------------|--------|-----------------|--------|
| Massachusetts   | I      | Connecticut          | I      | New Hampshire   | I      |
| Rhode Island    | I      | Maine                | I      | Vermont         | I      |
| New York        | II     | New Jersey           | II     | Puerto Rico     | II     |
| Delaware        | III    | District of Columbia | III    | Pennsylvania    | III    |
| Virginia        | III    | Maryland             | III    | West Virginia   | III    |
| Florida         | IV     | Kentucky             | IV     | Georgia         | IV     |
| Mississippi     | IV     | North Carolina       | IV     | Alabama         | IV     |
| Tennessee       | IV     | South Carolina       | IV     | Illinois        | V      |
| Ohio            | V      | Michigan             | V      | Indiana         | V      |
| Wisconsin       | V      | Minnesota            | V      | Texas           | VI     |
| Louisiana       | VI     | New Mexico           | VI     | Oklahoma        | VI     |
| Arkansas        | VI     | Missouri             | VII    | Kansas          | VII    |
| Iowa            | VII    | Nebraska             | VII    | Colorado        | VIII   |
| Utah            | VIII   | Montana              | VIII   | North Dakota    | VIII   |
| South Dakota    | VIII   | Wyoming              | VIII   | California      | IX     |
| Arizona         | IX     | Hawaii               | IX     | Nevada          | IX     |
| Oregon          | X      | Idaho                | X      | Washington      | X      |
|                 |        |                      |        | Alaska          | X      |

### *Non-Monitoring Years*

During non-monitoring years, OCC continues to track State progress and compliance through ongoing oversight and communication with States. This typically takes place in the form of monthly calls between the Regional Office and the State, as well as ongoing review of reports (such as the ACF-404 improper payment report, the ACF-696 financial report, the ACF-800 and 801 administrative data reports, and state audits). Support is provided to the State around the submission, review, and approval of amendments for any changes to the CCDF Plan. Onsite visits continue to be part of OCC's oversight and TA work with State Lead Agencies.

### **Focus Areas**

OCC defines specific topical focus areas for each three-year monitoring cycle. This enables a more thorough analysis of the State's ability to demonstrate compliance with the selected CCDF regulations for that monitoring cycle. It also enables OCC to adapt its monitoring processes to reflect emerging trends, compliance concerns, and the evolving priorities of each administration.

The CCDF regulations being reviewed for Monitoring Cycle #2 (FFY 2021-2024) fall into the following nine topical areas, shown in **Table 3**. New topic areas for Cycle 2 are starred in the list below.

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**TABLE 3**

| <b>Monitoring Topic</b>   |
|---|
| <p>Consumer Education: Dissemination of Information to Parents, Providers, and General Public</p> <ul style="list-style-type: none"> <li>• Monitoring Reports</li> <li>• Annual Aggregate Data</li> </ul>   |
| <p>12-Month Eligibility</p> <ul style="list-style-type: none"> <li>• Eligibility Determination and Re-determination</li> <li>• Continued Assistance/Job Search</li> <li>• Graduated Phase-out</li> <li>• Change Reporting*</li> <li>• Co-payments During the 12-Month Period*</li> </ul>  |
| <p>Equal Access</p> <ul style="list-style-type: none"> <li>• Building the Supply of Child Care for Underserved Populations*</li> <li>• Sliding Fee Scales*</li> <li>• Waiving Co-payments*</li> <li>• Payment Policies* <ul style="list-style-type: none"> <li>— Timeliness of Payments</li> <li>— Delinking Provider Payments from a Child's Occasional Absences</li> <li>— Generally Accepted Payment Practices</li> </ul> </li> </ul>  |
| <p>Health and Safety Requirements for Providers</p> <ul style="list-style-type: none"> <li>• 11 health and safety topics for all CCDF-eligible providers</li> </ul>   |
| <p>Pre-Service/Orientation and Ongoing Training for Providers</p> <ul style="list-style-type: none"> <li>• 11 health and safety topics for all CCDF-eligible providers</li> </ul>   |
| <p>Inspections for Licensed CCDF Providers, which include inspections for compliance with:</p> <ul style="list-style-type: none"> <li>• Health and safety requirements and fire standards</li> <li>• Pre-service/orientation and ongoing training requirements</li> <li>• Child:staff ratios and group sizes</li> </ul>   |
| <p>Inspections for License-Exempt CCDF Providers, which include inspections for compliance with:</p> <ul style="list-style-type: none"> <li>• Health and safety requirements and fire standards</li> <li>• Pre-service/orientation and ongoing training</li> <li>• Child:staff ratios and group sizes</li> </ul>  |
| <p>Background Checks</p> <ul style="list-style-type: none"> <li>• Requirements for FBI fingerprint checks*</li> <li>• In-State searches of the State criminal repository* <ul style="list-style-type: none"> <li>— State sex offender registry</li> <li>— State-based child abuse and neglect registry and database</li> </ul> </li> </ul>  |
| <p>Program Integrity and Accountability</p> <ul style="list-style-type: none"> <li>• Written Agreements*</li> <li>• Effective Internal Controls – Identification of Risk*</li> <li>• Effective Internal Controls – Provider and Staff Training</li> <li>• Effective Internal Controls – Evaluation of Activities</li> <li>• Identifying Fraud or Other Program Violations</li> <li>• Fraud Investigation, Payment Recovery, and Sanctions</li> <li>• Documenting and Verifying Child Eligibility</li> </ul> |

\*The specific regulatory language being monitored in each topic is found in the *Compliance Demonstration Packet*.



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### III. Monitoring Process Overview

#### The OCC Monitoring Team

Throughout the OCC monitoring process, the State and its CCDF Team work closely with an OCC Monitoring Team. **OCC Monitoring Team members include:**

- OCC Regional Program Manager;
- Assigned OCC Regional Program Specialist(s);
- Representative(s) from the OCC Central Office; and
- Representatives from OCC’s monitoring contractor, WRMA, Inc.

#### Structuring the State Team

The State administrator ensures that the OCC Monitoring Team gets the evidence it needs, during all three phases of monitoring, to determine the State’s compliance with the regulations being monitored. State Administrators should engage other state-level CCDF leadership (such as subsidy, licensing/monitoring, and professional development managers) in all phases of the process.

This **State Team**, identified and led by the State administrator or designee:

- Attends trainings and calls;
- Completes the *Compliance Demonstration Chart*;
- Completes the *Document Submission Chart* and submits materials for the OCC Monitoring Team to review;
- Works with the OCC Monitoring Team to coordinate the logistics of the onsite visit;
- Actively participates in the visit;
- Responds to questions and requests for evidence during the Post-Visit Phase; and
- Participates in the Virtual Exit Conference to close out the monitoring process.



#### TEAM TIP

Many States find it worthwhile to bring other partners (contractors, other State agencies, etc.) into the planning process early so that everyone is aware of the goals and expectations for the monitoring process. This guide will help determine who to include on the State Team.

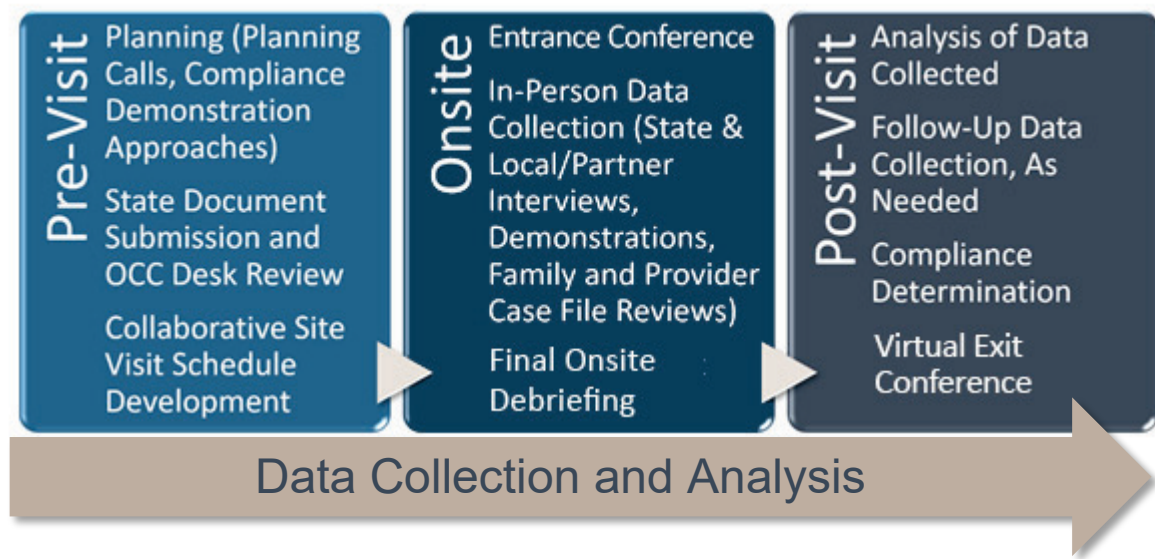
#### Overview of the Monitoring Phases

The OCC monitoring process is divided into three phases which occur over several months: pre-visit planning and document review, the three-day onsite visit, and post-visit documentation and compliance determination.

A high-level overview of the major activities in each of the three phases of OCC Monitoring is shown in **Figure 2** below.

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FIGURE 2



### Pre-Visit Phase Overview

During the Pre-Visit Phase, the OCC Monitoring Team and the State work collaboratively to identify State-specific approaches that ensure that the monitoring effort captures data about the State's compliance with the CCDF regulations within the context of the State's CCDF Plan and child care system structure. The OCC Monitoring Team begins data collection and analysis in this phase, including completion of an extensive review of written materials provided by the State. Note that in OCC Monitoring, unlike many other federal monitoring or audit processes, the heaviest lift for States comes during the Pre-Visit Phase.

### **i** ADDITIONAL INFO

This section provides a brief overview of the three phases. For the full details regarding the steps included in the Pre-Visit, Onsite, and Post-Visit Phases, see *VI. Monitoring Activities*.

### Onsite Phase Overview

During the Onsite Phase, the OCC Monitoring Team visits the State. During the visit, the OCC Monitoring Team collects data in person through in-depth targeted interviews with, and demonstrations by, the State and its partners, as well as through guided reviews of subsidy and licensing/monitoring case files. The onsite data collection can both supplement the pre-visit data collection and provide on-the-ground validation of evidence collected during the desk review.

### Post-Visit Phase Overview

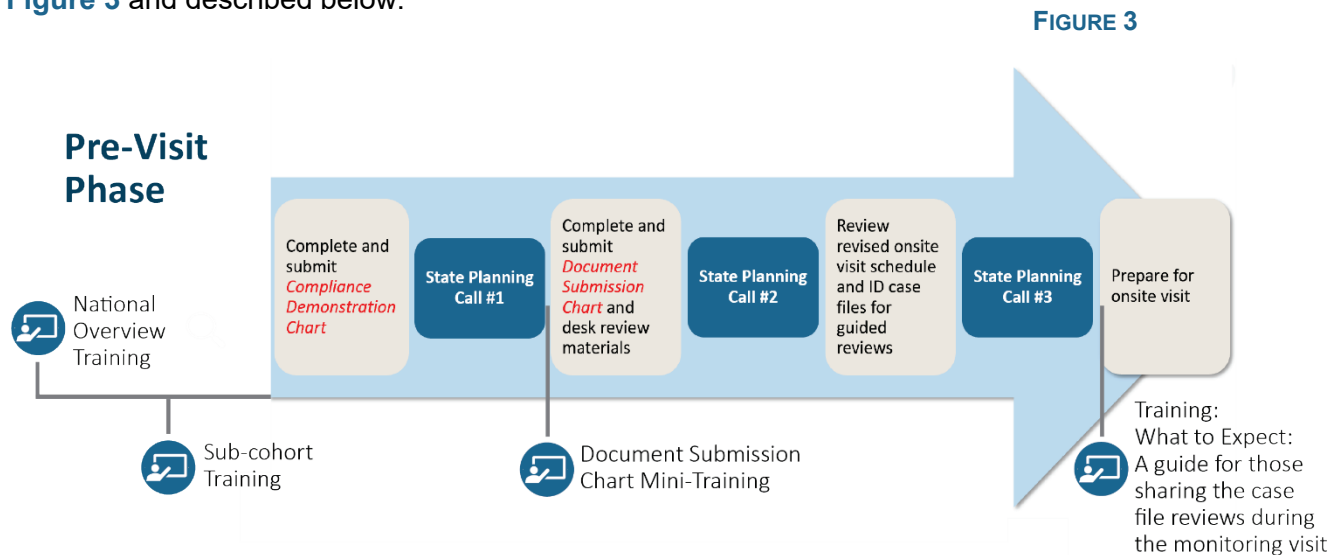
During the Post-Visit Phase, the OCC Monitoring Team analyzes evidence from all three phases and makes preliminary determinations of the State's compliance with each regulation monitored. OCC makes a preliminary compliance determination which is shared prior to the Virtual Exit Conference with the State. The State has the option to respond to the preliminary compliance determination. Following the State's (optional) response, OCC disseminates a Final Compliance Determination letter, officially ending the monitoring process.

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Throughout the monitoring process, OCC identifies promising practices within States to inform continuous quality improvement. TA support, if needed, will occur outside of the monitoring process.

## Training

OCC provides training to States during the Pre-Visit Phase to help them understand the monitoring process and expectations and to address questions. Trainings for States are noted in **Figure 3** and described below:



### Monitoring National Overview

This approximately 45-minute self-paced training is offered one time per year ahead of the start of the cohort and provides a high-level overview of:

- OCC's monitoring approach, the topics included, and recommended participants;
- The three phases of monitoring and key activities occurring within each; and
- Next steps in the OCC monitoring process.

More detailed information on these processes is listed in *V. Monitoring Visit - Pre-Visit Phase*. State administrators and staff, as well as partner organizations, are invited to attend the *OCC Monitoring National Overview* training. Regional Offices will provide States with the date, details, and registration instructions for this training ahead of the start of the Cohort.

### **i** ADDITIONAL INFO

To view a recording of these trainings, see the OCC webpage, *CCDF Monitoring Cycle 2 Resources for States*: <https://www.acf.hhs.gov/occ/policy-guidance/ccdf-monitoring-cycle-2-resources-states>

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### *Sub-Cohort Training*

Each sub-cohort receives just-in-time training on the OCC monitoring process ahead of the Pre-Visit Phase. This 1.5-hour *Sub-Cohort Training* webinar provides:

- Details regarding monitoring topics and regulations;
- A walk-through of the *Compliance Demonstration Packet*, including the *Compliance Demonstration Chart* and *Document Submission Chart*;
- Potential approaches to demonstrating compliance; and
- Details regarding the three pre-visit planning calls.

State administrators and staff, as well as partner organizations, are invited to attend the *Sub-Cohort Training*. Regional Offices will provide States with the date, details, and registration instructions for this training.

### *Document Submission Chart Mini-Training for States*

This 11-minute pre-recorded mini-training is provided to States just before they need to complete the *Document Submission Chart*. The training provides States with instructions on how to complete the *Document Submission Chart* and discusses:

- The structure and format of the *Document Submission Chart*;
- The types of documents that may be included; and
- The process for completing the chart and transmitting it to the OCC Monitoring Team.

State Administrators and staff are encouraged to complete the *Document Submission Chart Mini-training*. Regional Offices provide States the link to the training during State Planning Call #1.

### *(COMING SOON!) What to Expect: A guide for those sharing the case file reviews during the monitoring visit*

This self-paced training is designed for those local staff and partners who will be participating as part of the monitoring visit, particularly those who will be presenting the guided case file reviews. The training should be completed a week or two ahead of the virtual visit and is designed to:

- Provide a high-level overview of OCC Monitoring and explain why OCC conducts the guided case files as a part of monitoring;
- Discuss the work already done as part of monitoring during the Pre-Visit Phase between the State and the OCC Monitoring Team;
- Demonstrate a sample guided case file interview as a way to understand the interview flow and types of questions that may be asked; and
- Show a sample of the Adobe Connect room, should the State's monitoring visit happen virtually due to an emergency.

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## IV. Outreach and Scheduling

### Initial Cohort Outreach

Prior to the *OCC Monitoring National Overview* training, OCC sends a letter to the States in the upcoming cohort to announce the start of the monitoring process. The letter includes the date and registration information for the *OCC Monitoring National Overview* training and materials for the Pre-Visit Phase.

### National Scheduling Process

#### *Establishing Visit Dates*

OCC works with States to confirm availability for the recommended onsite visit dates. Once the national schedule of onsite visits for the cohort has been finalized, the Regional Office sends a confirmation letter to the State with the dates for the onsite visit, the date for the appropriate *Sub-Cohort Training*, and the *State-Specific Monitoring Activities Chart* (Appendix B-3), which includes proposed dates for calls, document submissions, etc.

## V. Monitoring Activities

### Overview

As noted above in Section III, the OCC monitoring process is divided into three phases which occur over several months (as shown in **Figure 4**): pre-visit planning and document review, the three-day onsite visit, and post-visit documentation and compliance determination. Although the full process takes months to complete, monitoring is a point-in-time look at compliance. The OCC Monitoring Team will review the State's compliance with each of the monitoring topics up to, and including, the time of the onsite visit.

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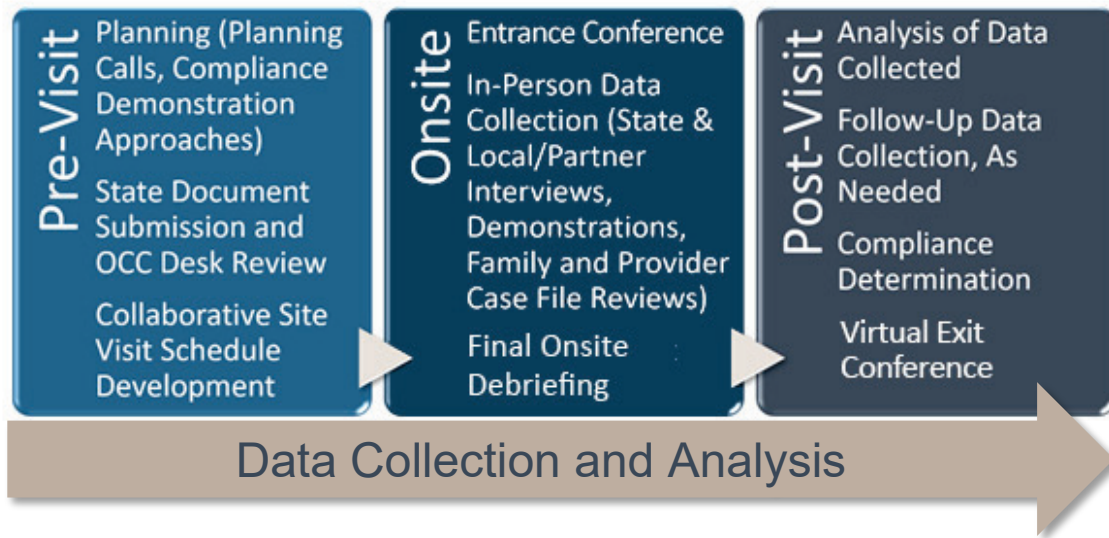


FIGURE 4

## Pre-Visit Phase

The Pre-Visit Phase of the OCC monitoring process is an intensive period of preparation and learning for all involved. During this phase, members of the OCC Monitoring Team spend five to six months analyzing information about the State being monitored, documenting initial evidence observed, identifying follow-up questions, and using that information to plan a meaningful onsite monitoring visit.

**Figure 5** provides a high-level flowchart of State Pre-Visit Phase activities. States should refer to their *State Monitoring Activities* document received with the confirmation letter, which provides more detail.



## ADDITIONAL INFO

Several trainings will be provided to the State during the Pre-Visit Phase to help the State prepare for monitoring:

- *National Monitoring Overview Training*
- *Sub-Cohort Training*
- *Document Submission Chart Training*
- *(COMING SOON!) What to Expect: A guide for those sharing the case file reviews during the monitoring visit*

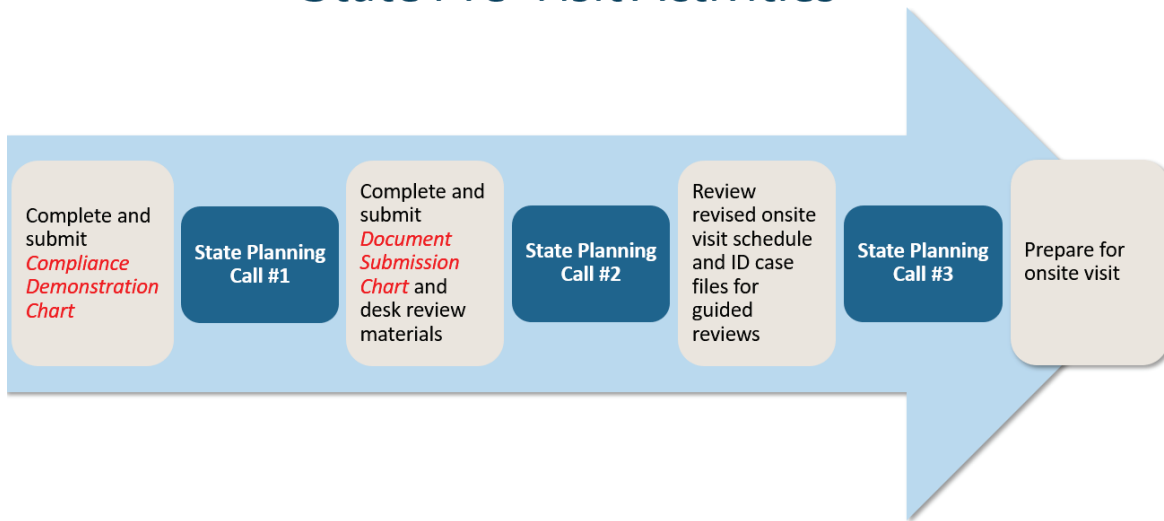
See Section II for details regarding these trainings.



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FIGURE 5

## State Pre-Visit Activities



The OCC Monitoring Team conducts three virtual planning calls with the State within the Pre-Visit Phase. The State completes two key documents during this phase (noted in red on the flowchart) — the *Compliance Demonstration Chart* and *Document Submission Chart*. Both documents are included in the *Compliance Demonstration Packet*.

The OCC Monitoring Team reviews evidence provided on the *Compliance Demonstration Chart* and *Document Submission Chart* and data collected on the two charts drives the structure of the onsite visit that follows.

### *Compliance Demonstration Chart*

Before the first State Planning Call, the State completes the *Compliance Demonstration Chart*. This is a document that allows the State to propose its approach for demonstrating compliance with the nine monitoring topics and guides the process for data collection. The *Compliance Demonstration Chart* is Part I of the *Compliance Demonstration Packet*.

LEARN  
MORE



**IMPORTANT:** Before completing the *Compliance Demonstration Chart*, review the Types of Evidence section of this guide.

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The chart lists each of the nine topic areas for the current monitoring cycle and the specific regulations being monitored for each topic. The State documents the proposed methods for demonstrating compliance for each regulation on the *Compliance Demonstration Chart*. These methods may be pre-visit documentation (which are included in Column B), onsite activities (which are included in Column C), or, in most cases, both. The *Compliance Demonstration Chart* does not need to include lengthy paragraphs, web links, or document details. It is a high-level document used to share the approach the State would like to use to demonstrate compliance.



## TEAM TIP

Complete and submit the *Compliance Demonstration Chart* using Microsoft Word. Do NOT convert the document to PDF or another format; the State and the OCC Monitoring Team uses, edits, and shares the chart in different ways during the monitoring process.

The OCC Monitoring Team reviews the pre-visit and onsite demonstration methods proposed in the State's completed *Compliance Demonstration Chart* and provides feedback for discussion about how the proposed methods will provide the OCC Monitoring Team with sufficient evidence of the State's compliance. (See the excerpt of a Sample Completed *Compliance Demonstration Chart: Cycle 2* in [Figure 6](#).)

**FIGURE 6**

| CCDF Rule<br>(Column A)  | Proposed Approach To Demonstrating Compliance With This Requirement |   |
|--|---|---|
|  | (Column B)  | (Column C)  |
| <b>Twelve-Month Eligibility</b>  |   |   |
| <b>98.21(a)(1): 12-Month Eligibility Determination &amp; Re-determination</b><br>(a) A Lead Agency shall re-determine a child's eligibility for child care services no sooner than 12 months following the initial determination or most recent re-determination, subject to the following:<br>(1) During the period of time between determinations or re-determinations, if the child met all of the requirements in §98.20(a) on the date of the most recent eligibility determination or re-determination, the child shall be considered eligible and will receive services at least at the same level, regardless of:<br>(i) A change in family income, if that family income does not exceed 85 percent of SMI for a family of the same size; or<br>(ii) A temporary change in the ongoing status of the child's parent as working or attending a job training or educational program. A temporary change shall include, at a minimum:<br>(A) Any time-limited absence from work for an employed parent due to reasons such as need to care for a family member or an illness;<br>(B) Any interruption in work for a seasonal worker who is not working between regular industry work seasons;<br>(C) Any student holiday or break for a parent participating in training or education;<br>(D) Any reduction in work, training or education hours, as long as the parent is still working or attending training or education.<br>(E) Any other cessation of work or attendance at a training or education program that does not exceed three months, or a longer period of time established by the Lead Agency;<br>(F) Any change in age, including turning 13 years old during the eligibility period; and<br>(G) Any change in residency within the State or Territory. | <b>Pre-Visit Information</b>  |   |
|  | Child Care Subsidy Policy Manual<br><br>DHS Administrative Code     | <b>Onsite</b><br><br>Guided Case File Reviews<br><br>Interviews with State staff and County Eligibility Technicians |

## Types of Evidence

The means for demonstrating compliance with the CCDF regulations will vary from topic to topic. Consider submitting different kinds of evidence for each regulation, so that the OCC Monitoring Team can not only observe what policies/rules the State has put into place, but also how the policies/rules are being implemented by the Lead Agency and by the local offices/partner sites, contractors, and child care providers that carry out the work.

It is important to think about all provider types for the topics related to licensing/monitoring and professional development, and other relevant offices/programs that the Lead Agency coordinates with to administer CCDF. Think holistically about the Lead Agency's CCDF program when completing the *Compliance Demonstration Chart*.

The State needs to demonstrate compliance for all provider types, so in the *Compliance Demonstration Chart* be sure to include the requirements for licensed and license-exempt providers and all of the categories of care that are CCDF-eligible in the State (center-based, home-based, in-home, day camps, schools, etc.).

Examples of the types of evidence the OCC Monitoring Teams typically see during the Pre-Visit and Onsite Phases are noted below:



### TEAM TIP

It is important to be strategic when completing the *Compliance Demonstration Chart*. For each regulation ask, "What do we have that will provide the OCC Monitoring Team with the most **direct** and **targeted** evidence to meet the regulation?" Being strategic will reduce the amount of back-and-forth communication needed for the Monitoring Team to complete their review.

The State does not need to submit duplicative documents that communicate the same information.

### Pre-Visit Examples

- State rules, statutes, and regulations
- Policy and staff training manuals
- Provider agreements and forms
- Family applications, forms
- Licensing/monitoring checklists or trainings
- Internal notes, communications
- Other resources for parents, providers, State staff, etc.
- Written agreements or contracts with entities or other intermediaries responsible for CCDF administration

### Onsite Examples

- Discussions with State leadership
- System demonstrations
  - Eligibility system
  - Licensing/monitoring inspection systems
  - Consumer education website
  - Professional development systems
- Conversations with eligibility workers and licensing staff in field offices
- Guided provider licensing/monitoring file reviews
- Guided subsidy family case file reviews

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### *Evidence Related to Changes Made Resulting from COVID-Related Funding*

Remember that Monitoring is a point in time and will focus on current implementation, which may include new or different policies and practices implemented in response to the expanded funding through (including Coronavirus Aid, Relief, and Economic Security [CARES] Act; Coronavirus Response and Relief Supplemental Appropriations Act [CRRSA]; and American Rescue Plan [ARP] Act). States may have new policy transmittals, updated policy manuals, updated provider agreements and family applications that have been revised in response to the additional funding. Make sure to submit the most recent versions so that Monitoring Teams can review the correct evidence.

### *Evidence of Delegated Authority*

If the State's Lead Agency delegates inspection or subsidy authority to another entity, the Monitoring Team needs to review a memorandum of understanding (MOU) or some other form of evidence demonstrating that the delegated agency adheres to the CCDF rules.

### *State Planning Call #1*

After completing the *Compliance Demonstration Chart*, the State meets with the OCC Monitoring Team on State Planning Call #1 for about two hours to:

- Discuss the approaches and make any changes or adjustments to the *Compliance Demonstration Chart*, as needed. (By the end of the call, there should be agreement about what documents and links the State will provide before the onsite visit for the desk review, when the documents will be submitted, and what data collection activities the OCC Monitoring Team will undertake onsite to document and validate the State's compliance.);
- Walk through instructions for the completion of the *Document Submission Chart* (the next chart to be completed by the State);
- Discuss at a high level how the onsite data collection activities might fit into the onsite schedule; and
- Discuss initial visit logistics.

After State Planning Call #1, the Regional Office sends a summary of the agreed upon changes or additions to the *Compliance Demonstration Chart* to the State. The State's Team then reviews, updates, and submits the revised *Compliance Demonstration Chart* based on agreements made during State Planning Call #1. This should take about a week.



#### **ADDITIONAL INFO**

**IMPORTANT:** Before completing the *Document Submission Chart*, complete the *Document Submission Chart Mini-training for States* available via the CCDF *Monitoring Cycle 2 Resources for States* webpage: <https://www.acf.hhs.gov/occ/policy-guidance/ccdf-monitoring-cycle-2-resources-states>

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### Document Submission Chart

After submitting the revised *Compliance Demonstration Chart*, the State completes the *Document Submission Chart*. (See **Figure 7** below.) The *Document Submission Chart* is Part II of the *Compliance Demonstration Packet*. On this chart, the State maps for the OCC Monitoring Team where to locate the documentation that was proposed on the *Compliance Demonstration Chart*. The submission of the *Document Submission Chart* starts the OCC Monitoring Team's desk review process and supports the development of the onsite visit schedule.

On the *Document Submission Chart*, the State provides detailed information related to the identified materials.

Like the *Compliance Demonstration Chart*, it is organized by topic and by the specific regulations being monitored within each topic. This chart gives both the State and the OCC Monitoring Team an opportunity to organize and catalog the information being submitted for the pre-visit desk review.

On the *Compliance Demonstration Chart*, States provide detailed information such as specific document names, section and page numbers, etc. that relate specifically to the topic and component of the CCDF regulation. States should be strategic and identify the resources that will provide the most direct and targeted evidence for each regulation being monitored. (For example, if the State's standards for safe sleep practices are in the licensing rules, the link to the State's licensing rules will not suffice. States should include the actual page number and/or citation number.)

Note that:

- The State may send documents in batches at any time prior to the deadline determined on State Planning Call #1.
- The deadline for submission is approximately four weeks following State Planning Call #1.
- The State should submit the *Document Submission Chart*, along with listed attachments, to their Regional Office.

Between the receipt of the State's materials and State Planning Call #2, the OCC Monitoring Team will conduct an extensive desk review. Based on the information collected and analyzed during the desk review process, and the information in the updated *Compliance Demonstration Chart*, the OCC Monitoring Team starts developing a draft of the detailed onsite visit schedule.

### Personally Identifiable Information

Personally Identifiable Information, or PII, is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Because monitoring looks at actual case files during the interviews, PII comes into play. However, cautions are observed to ensure that this PII remains secure.


**ON THE GROUND**

Based on feedback received from States that have completed the monitoring process, the completion of the *Document Submission Chart* and the gathering and submission of those materials should take no more than one month.

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The State may share documentation that includes PII with the Monitoring Team during the onsite visit (or via screen in the event of a virtual visit due to an emergency); the Monitoring Team will not leave with any information containing PII. If asked to send any sample versions of documents following the visit, please send blank versions. Do not send or upload any documents that include PII like social security numbers, addresses, dates of birth, etc.

**FIGURE 7**

Expiration Date: XXXX

| CCDF Rule  | Document to Review | File Name or URL | Page/Section | Date Sent |
|--|--------------------|------------------|--------------|-----------|
| <b>Consumer Education: Dissemination of Information to Parents, Providers, and General Public (Monitoring Reports and Annual Aggregate Data)</b> |                    |                  |              |           |
| 98.33(a)(4):<br>Consumer Ed. -<br>Posting Monitoring &<br>Inspection Reports   |                    |                  |              |           |
|  |                    |                  |              |           |
|  |                    |                  |              |           |
|  |                    |                  |              |           |
| 98.33(a)(5):<br>Consumer Ed. –<br>Annual Aggregate<br>Data   |                    |                  |              |           |
|  |                    |                  |              |           |
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|  |                    |                  |              |           |
| <b>Twelve-Month Eligibility</b>  |                    |                  |              |           |
| 98.21(a)(1):<br>12-Month Eligibility<br>Determination & Re-<br>determination   |                    |                  |              |           |
|  |                    |                  |              |           |
|  |                    |                  |              |           |
|  |                    |                  |              |           |

### *State Planning Call #2*

State Planning Call #2 usually lasts two hours and occurs about six weeks before the onsite visit. On this call:

- The OCC Monitoring Team shares questions from the desk review that have a bearing on the completion of the desk review and highlight any topic areas/regulations needing additional follow-up onsite.
- The OCC Monitoring Team and the State reviews the proposed onsite monitoring schedule, looking at details (including identification of potential staff to be interviewed) and logistics.
- The OCC Monitoring Team responds to any State questions and identifies next steps that both the OCC Monitoring Team and the State should take to continue visit preparations.



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After State Planning Call #2, the OCC Monitoring Team sends the State an updated copy of the detailed draft onsite schedule. The State should review it carefully and confirm all participants, times, and locations. The State should review with staff and partners the family and provider case file selection process (See *Guided Case File Reviews* section below.) and determine what steps need to be taken to have files available and accessible to the OCC Monitoring Team when they come onsite.

### *The OCC Monitoring Team's Desk Review*

In the weeks leading up to the onsite visit, the OCC Monitoring Team uses the *Document Submission Chart* to conduct an extensive desk review of the evidence of compliance provided by the State, which allows them to develop a deeper understanding of the State's CCDF structure, policies, and procedures and to make determinations about the State's compliance with the CCDF specific regulations. The results of the desk review support the structure and schedule of the onsite visit.

### *State Staff Preparation*

During this time period, the State Team should be preparing eligibility and licensing staff who will be interviewed at the onsite locations and/or walking the OCC Monitoring Team through the guided provider and family case reviews so they know what to expect when the team arrives. They also should be identifying and gathering the case records that meet the guidelines for review provided by the OCC Monitoring Team.

Be sure to share the *What to Expect: A guide for those sharing the case file reviews* during the monitoring visit training with those local staff and partners who will be participating as part of the monitoring visit, particularly those who will be presenting the guided case file reviews. The training is available via the *CCDF Monitoring Cycle 2 Resources for States* webpage: <https://www.acf.hhs.gov/occ/policy-guidance/ccdf-monitoring-cycle-2-resources-states>

Throughout the visit, OCC also will ask the State to share promising practices surrounding the topic areas. This is an opportunity for the State and partner staff to shine, sharing successes and/or innovations with the Monitoring Team.



#### **TEAM TIP**

State administrators have recommended sharing the *Compliance Demonstration Chart* with all staff participating in the visit so they know what specific materials were reviewed by the Monitoring Team prior to the visit. Staff and partners may use any resource available during interviews to assist in answering questions.

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### State Planning Call #3

State Planning Call #3 typically occurs a week or so before the onsite visit and lasts about an hour. During this call, the OCC Monitoring Team and the State Team will confirm details about the onsite visit. This is an opportunity for the State Team, including partners, to address any outstanding questions or concerns and to request clarifications about the data collection process.

After State Planning Call #3, the OCC Monitoring Team finalizes and shares the onsite visit schedule with the State. The State should share this final visit schedule with staff and partners, ensuring they are prepared for the visit. The State will also want to confirm room availability and A/V set-ups, confirm that selected family and provider case files are in place to be available and accessible for the OCC Monitoring Team, prepare the State's Entrance Conference presentation, and prepare for any system/process demonstrations.



#### ON THE GROUND

The State should *not over-prepare* for the onsite visit. There is no need to copy/organize/flag case files and no need to prepare presentations for the data collection sessions. With the exception of the agreed-upon system/process demonstrations, the data collection sessions are interactive discussions facilitated by the OCC Monitoring Team.

### Onsite Visit Phase

The Onsite Phase is the two to three days during which the OCC Monitoring Team visits the State to collect further evidence. The visit is typically scheduled Tuesday through Thursday of a given week. During the onsite visit, the OCC Monitoring Team members conduct a series of data collection sessions with the State that will include in-depth targeted interviews with staff and partners, demonstrations of program operations and resources, and guided reviews of family subsidy case files and provider licensing/monitoring files.

An overview of the typical onsite schedule is provided in **Figure 8**.

|    | Day 1  | Day 2   |   | Day 3   |
|----|--|---|---|---|
|    |  | Team A  | Team B  |   |
| AM | <ul style="list-style-type: none"> <li>Entrance Conference at State Office <ul style="list-style-type: none"> <li>OCC Presentation</li> <li>State Presentation</li> </ul> </li> <li>Data Collection Sessions at State Office(s) (<i>Topics TBD</i>) <ul style="list-style-type: none"> <li>Demonstrations</li> <li>Interviews</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>Off-site data collection sessions in outlying area(s) to see diverse settings &amp; service populations (<i>Topics TBD</i>) <ul style="list-style-type: none"> <li>Interviews</li> <li>Guided Case File Reviews</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>Off-site data collection sessions in outlying area(s) to see diverse settings &amp; service populations (<i>Topics TBD</i>) <ul style="list-style-type: none"> <li>Interviews</li> <li>Guided Case File Reviews</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>Debrief with State Administrator</li> <li>Data collection sessions (<i>Topics TBD</i>)</li> </ul>  |
| PM | <ul style="list-style-type: none"> <li>Data Collection Sessions at State Office(s) (<i>Topics TBD</i>) <ul style="list-style-type: none"> <li>Demonstrations</li> <li>Interviews</li> </ul> </li> <li>Debrief with State Administrator</li> </ul>  | <ul style="list-style-type: none"> <li>Off-site data collection sessions in outlying area(s) to see diverse settings &amp; service populations (<i>Topics TBD</i>) <ul style="list-style-type: none"> <li>Interviews</li> <li>Guided Case File Reviews</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>Off-site data collection sessions in outlying area(s) to see diverse settings &amp; service populations (<i>Topics TBD</i>) <ul style="list-style-type: none"> <li>Interviews</li> <li>Guided Case File Reviews</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>Final Onsite Debrief Session <ul style="list-style-type: none"> <li>State feedback on monitoring process</li> <li>Discussion of Monitoring Team's follow-up questions</li> <li>Next steps</li> </ul> </li> </ul> |

**FIGURE 8**

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### Entrance Conference

The onsite visit starts with a one-hour or less Entrance Conference on the first day that includes presentations by OCC and the State. The State's Entrance Conference presentation provides a brief overview of the State's CCDF structure, system, and processes. It can also highlight areas not covered by the current monitoring topics, such as quality initiatives. This presentation **should not be elaborate** and usually lasts less than 20 minutes. State administrators may choose to invite other State officials and/or partners to participate (high-level officials from the Lead Agency, other parts of the State government, partner agencies, etc.).



#### ON THE GROUND

Again, it is important not to over-prepare for the onsite visit. Entrance Conference presentations should not require a lot of advanced preparation by the State. The presentation should be simple and provide the Monitoring Team with a high-level understanding of the State's CCDF structure, system, and processes. If desired, the State may request a sample presentation.

The OCC Monitoring Team's presentation during the Entrance Conference reviews the monitoring approach and pre-visit preparations.

### Data Collection Sessions

The OCC Monitoring Team conducts data (evidence) collection sessions on all three days of the onsite visit. These may include staff/partner interviews, demonstrations of program operations and resources, and guided reviews of family subsidy case files and provider licensing/monitoring files. Some of the data collection sessions occur at the Lead Agency's office, while others may take place at partner or local/regional office locations.

The State CCDF administrator(s) typically participates in most, if not all, of the onsite visit sessions, as s/he deems appropriate. Other participants in one or more data collection sessions during the week typically include state-level subsidy, licensing/monitoring, and professional development managers; local subsidy and licensing/monitoring office managers and staff; and State and local partners, such as professional development providers, emergency preparedness partners, and consumer education providers.

### Data Collection Day 1

The OCC Monitoring Team collects evidence providing a high-level overview of how the State's program is administered.

The OCC Monitoring Team spends the majority of the day on topical data collection sessions, typically conducting in-depth, targeted interviews at the Lead Agency office(s) or at other offices within the capital city.



#### ON THE GROUND

The OCC Monitoring Team will not collect material that contains Personally Identifiable Information (PII). Please do not copy case files for the team to take off the premises. See the *Section V. Monitoring Activities → Pre-Visit Phase → Personally Identifiable Information* for additional detail regarding PII.

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### *Data Collection Day 2*

The OCC Monitoring Team will typically divide into two teams on the second day of the visit to conduct in-depth, targeted interviews at subsidy and licensing/monitoring sites outside of the capital area. The Monitoring Team typically visits diverse locations (e.g., urban and rural, high and low caseloads) in order to understand the State’s unique context and challenges. There are similarities between the questions asked during the state-level sessions and those asked during the local-level sessions. The Monitoring Team is trying to validate the State’s policies and practices as they are designed and as they are implemented on the ground. As noted above, the Monitoring Team will also ask about promising practices throughout the visit.

### *Data Collection Day 3*

The OCC Monitoring Team comes back together, typically at the Lead Agency office, for additional data collection and the Final Onsite Debriefing. (See details regarding the Final Onsite Debriefing below.)

### *State Debriefings*

The State participates in 15- to 30-minute debriefings with the OCC Monitoring Team at the end of each day of the onsite visit. The State administrator may involve other members of the State Team in the debriefings, as s/he sees fit. During the debriefings, the OCC Monitoring Team follows-up on any questions identified during the data collection sessions and addresses any State questions or concerns. The State may also provide feedback on the monitoring process. During the Final Onsite Debriefing, the OCC Monitoring Team provides an overview of the Post-Visit Phase. Compliance determinations are not shared during the State Debriefings.

### *Monitoring Options in an Emergency*

Onsite visits are extremely valuable to the integrity of OCC’s monitoring process. However, in the event that visiting your State at the originally scheduled time is not possible due to a national or local emergency, the Monitoring Team may request to reschedule the visit. If the emergency prevents the Monitoring Team from conducting an onsite, the Monitoring Team will work with you to plan a virtual visit as an alternative to the onsite visit. Although a virtual visit cannot fully replicate the onsite experience, it includes many of the same kinds of data collection sessions with the State and its partners that would have happened onsite. Additional information is provided in [\*Appendix B-5: Virtual Monitoring Visits Due to Emergency\*](#).

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## Guided Case File Reviews

During the Onsite Phase, the OCC Monitoring Team collects evidence via guided case file reviews conducted by the State/partner agencies. Unlike some other federal monitoring processes, the OCC Monitoring Team will not pull cases to review for accuracy. The State selects cases based on the criteria listed below, as well as discussion with the Monitoring Team. Then a case worker/inspector walks the OCC Monitoring Team through the case processing procedure.

There are two types of case files that are reviewed during the onsite monitoring visit: (1) subsidy case files (family case files looking at family eligibility, etc.) and (2) provider monitoring/inspection case files. For each type, there are selection criteria for the State to follow, as noted below.

**For subsidy case files**, the State provides at least one case per data collection site fitting into each of the following categories (a single case may fit into more than one category):

- Shows an approved application and the initial start and end date of the 12-month certification period;
- Shows a redetermination at 12 months;
- Shows continued assistance/job search provided due to a non-temporary cessation of work, school or training activity (if the State chooses to discontinue assistance in such situations);
- Shows closure before 12 months;
- Shows initial job search (if the State chooses to offer this option);
- Shows graduated phase out implemented at redetermination (if applicable); and
- Shows a waived co-payment (if the State chooses to offer this option).

**For provider monitoring/inspection case files**, the State provides at least one case per data collection site fitting into each of the following categories (a single case may fit into more than one category):

- Includes a fatality or serious injury;
- Shows a visit that was the result of a complaint; and
- Shows a corrective action plan.

Across visit locations, the State provides case files from the full range of the State's CCDF-eligible provider types. States have many different terms and definitions of provider types, especially those that are license-exempt (examples include "registered," "listed," "FFN," and "religious exempt"); **OCC monitoring looks at all CCDF-eligible provider types**. As noted in §98.42(c), States have the option to exclude "grandparents, great grandparents, siblings (if such providers live in a separate residence), aunts, or uncles" from their provider monitoring requirements.

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In addition to looking at documentation for the category listed above, the OCC Monitoring Team looks at each case for evidence of required inspections (pre-licensure and annual, as appropriate to the provider type).

### *State Staff Walk the OCC Monitoring Team Through the Guided Case Files*

For both the subsidy case files and the provider monitoring/inspection case files, staff at the data collection sites during the onsite visit walk the Monitoring Team through each of the cases selected, showing how it fits into the category and how it demonstrates the State's processes and procedures in action.

To help the staff presenting the selected cases prepare for the visit, the State also should share the following resources with them in advance of the monitoring visit:

- *(COMING SOON!) What to Expect: A guide for those sharing the case file reviews* training available via the *CCDF Monitoring Cycle 2 Resources for States* webpage: <https://www.acf.hhs.gov/occ/policy-guidance/ccdf-monitoring-cycle-2-resources-states>
- The *Case File Selection Criteria and Processes PowerPoint* which outlines the requirements for the case files. This document will be shared with the State during the Pre-Visit Phase.



### **TEAM TIP**

The OCC Monitoring Team is not looking for stacks and stacks of cases nor a statistical sample to review themselves. Typically, the total number of cases for review is less than 10 per data collection site. Also, remember that this is a point-in-time review. (For example, if a provider has been licensed since 1994, the Monitoring Team does not need to see over 25 years of inspection history. Rather they will need recent monitoring and enforcement actions over the last year or so that relate to the specific criteria selected.) The point of the guided case review is not to review for accuracy and errors, but to understand the process itself as it relates to the different types of situations.



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The OCC Monitoring Team works with the State in the Pre-Visit Phase to identify who can share the cases. Typically, the OCC Monitoring Team talks to both the "line staff" — the subsidy caseworkers and licensors/inspectors — and their supervisors. State-level staff may sit in on the case review; however, the OCC Monitoring Team's goal is to hear from local staff and to understand the State's processes and systems from their perspective.



## ON THE GROUND

Multiple people may need to be present during the guided case reviews onsite. The type of staff and their roles may vary from State to State; they may be State staff, local agency staff, CCR&R staff, or other contractors. Think about who, in your State, can best share the case.

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## Understanding the Relationship of the Health and Safety Topics

Monitoring topics “Health and Safety Requirements for Providers,” “Pre-Service/Orientation and Ongoing Training for Providers,” “Inspections for Licensed CCDF Providers,” and “Inspections for License-Exempt CCDF Providers” are all related. (The specific regulatory language being monitored in each topic can be found in the *Compliance Demonstration Packet*.) It is important to understand this relationship during the OCC monitoring process as it is a driver for how the OCC Monitoring Team collects evidence during the process.

First, note that **Health and Safety Requirements for Providers** encompasses 11 more-detailed health and safety requirements. They include:

1. The prevention and control of infectious diseases (including immunizations);
2. Prevention of sudden infant death syndrome and use of safe sleeping practices;
3. Administration of medication, consistent with standards for parental consent;
4. Prevention and response to emergencies due to food and allergic reactions;
5. Building and physical premises safety, including identification of and protection from hazards, bodies of water, and vehicular traffic;
6. Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment;
7. Emergency preparedness and response planning (*including detailed components*);
8. Handling and storage of hazardous materials and the appropriate disposal of biocontaminants;
9. Appropriate precautions in transporting children, if applicable;
10. Pediatric first aid and cardiopulmonary resuscitation; and
11. Recognition and reporting of child abuse and neglect, in accordance with the requirement at 98.41(e).

**Under this topic**, for each of the 11 health and safety requirements, the OCC Monitoring Team looks at the State’s standards/requirements for all CCDF-eligible child care providers. Those standards/requirements are typically set at the State level, but they might be found in many different places, such as State statutes, regulations, administrative rules, or CCDF provider agreements.

**Under Pre-Service/Orientation and Ongoing Training for Providers**, the OCC Monitoring Team looks at the State’s requirements for pre-service/orientation and ongoing training for all eligible CCDF providers around the 11 health and safety requirements. For ongoing training, States have flexibility in determining which health and safety trainings should be repeated and how often. Where these orientation/training requirements reside varies from State to State; they may be defined in State statutes, regulations, administrative rules, CCDF provider agreements, or elsewhere.

Regardless of where these requirements reside, the Monitoring Team looks for evidence of the requirements in the Pre-Visit Phase and during the onsite visit. The Team talks with the State staff and/or contractors responsible for setting and implementing the training requirements and

those responsible for creating any registries or other systems that support or track provider participation.

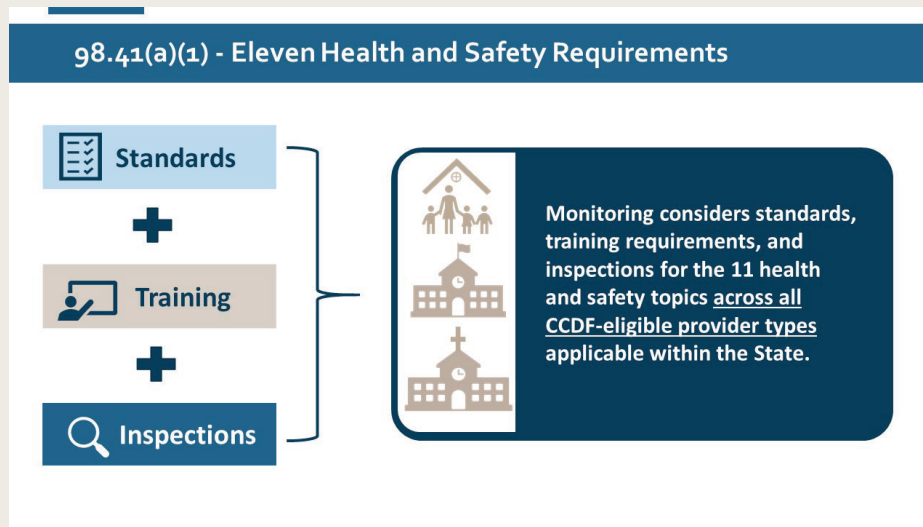


FIGURE 9

**Under Inspections for Licensed CCDF Providers and Inspections for License-Exempt CCDF Providers**, the OCC Monitoring Team looks at how the State ensures that licensed and license-exempt CCDF-eligible providers are in compliance with both the State’s health and safety (and fire) standards and the State’s training requirements around the 11 health and safety topics.

Monitoring and inspection work may be done by staff at the State, regional, and/or local level, or by partners. During the onsite visit, the OCC Monitoring Team wants to talk to the state-level leaders involved in setting monitoring/inspection policies and designing and implementing monitoring/inspection databases and systems, as well as licensors and/or other staff or contractors who are responsible for conducting the inspections.

As noted in Figure 9, **the OCC Monitoring Team looks at standards, training, and inspections for all of the 11 health and safety topics across all CCDF licensed and license-exempt provider types** applicable within the State. Note that States have many different terms and definitions of provider types, especially those that are license-exempt (examples include “registered,” “listed,” “FFN,” “in-home,” and “religious exempt”); **OCC monitoring looks at all CCDF-eligible provider types.**



## ON THE GROUND

Because Health and Safety topics are interconnected, be aware that during the onsite visit the OCC Monitoring Team may ask a lot of similar-sounding questions as they work to gain a solid understanding of the State’s standards, training requirements, and inspection processes for all 11 health and safety topics across all CCDF-eligible provider types. Also remember that the Monitoring Team will be trying to both fill in gaps in understanding and validate information found during the pre-visit desk review.

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## Post-Visit Phase

The final phase of the OCC monitoring process is the Post-Visit Phase. **Figure 10** shows the key steps of the Post-Visit Phase.

**FIGURE 10**



### *State Post-Visit Communication*

Should the OCC Monitoring Team have questions about the data collected in the Pre-Visit and Onsite Phases, or if they need to collect additional data to help complete documentation and data analysis, they share that information with the State through post-visit calls and email. The OCC Monitoring Team inform the State what additional documentation is needed and will indicate due dates and next steps. The first communication is within three weeks of the onsite visit.

### *Preliminary Compliance Determination*

After the State post-visit communication is complete, the OCC Monitoring Team documents all the evidence collected across all three monitoring phases and recommends preliminary compliance determinations to OCC. A body comprised of the OCC Division Directors, called the Compliance Verification Team, meets to review and validate the OCC Monitoring Team's proposed determinations of the State's compliance or noncompliance with each regulation being monitored. This validation process ensures national consistency in the monitoring process and in compliance decisions.

### *Virtual Exit Conference*

Because OCC wants this process to be as open and transparent as possible, a Virtual Exit Conference is held with the State soon after the issuance of written findings. During this call, the State hears the preliminary compliance determination results. The State also has the opportunity to ask questions, provide additional clarification (if needed), and discuss the next steps in the process.

### *(Optional) State Written Response*

If there are any compliance concerns, the State has an opportunity to provide a written response. If the State submits additional evidence, OCC considers that information and then issues its Final Compliance Determination.

### *Final Compliance Determination*

OCC provides a letter to the State providing the Final Compliance Determination.

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## VI. Appendices

### Appendix A: Commonly Used Terms and Acronyms

#### *Commonly Used Terms & Definitions*

| Term                                       | Definition   |
|--|--|
| <b>Cohort</b>                              | The group of States being monitored in one federal fiscal year. States are divided into three monitoring cohorts of 17 States each. Three monitoring cohorts make up one monitoring cycle.   |
| <b>Compliance Verification Team</b>        | A body comprised the OCC Division Directors that meets to review and validate the OCC Monitoring Team's proposed determinations of the State's compliance or noncompliance with each regulation being monitored.   |
| <b>Data Collection Session</b>             | A meeting (usually during the onsite visit) between the OCC Monitoring Team and State staff, partners, and/or subrecipients structured to help the OCC Monitoring Team gather evidence of the State's compliance with specific regulations. The goals of the data collection sessions are to provide the OCC Monitoring Team a comprehensive understanding of how the State is implementing the CCDF topics/regulations being monitored, validate evidence observed during desk review by observing State practices in action on the ground, and/or fill in gaps of knowledge that OCC Monitoring Team was not able to gain during the desk review. Data collection sessions may occur at the Lead Agency's office or at partner/local/regional office locations. Locations are selected in consultation with the State based on a variety of criteria that include the State's CCDF organizational structure, geographic and demographic considerations, and the availability of subsidy and licensing/monitoring case files (whether paper or electronic). |
| <b>Desk Review</b>                         | The OCC Monitoring Team's period of review and analysis of evidence of compliance provided by the State during the Pre-Visit Phase of the monitoring process.  |
| <b>Evidence</b>                            | Any documentation, demonstration, verbal response, or other piece of information that supports a State's claim of compliance with the regulation being monitored. Pre-visit evidence, such as State statutes, rules, regulations, manuals, and websites, is evidence that can be shared for the desk review. Onsite evidence is anything that can/should be observed or gathered in person, whether through system/process demonstrations, in-depth interviews, or guided case file reviews.   |
| <b>Monitoring Cycle</b>                    | A three-year period, aligning with a CCDF Plan Period, during which all States are monitored. OCC defines specific monitoring processes and topics for each cycle.   |
| <b>OCC Monitoring Team</b>                 | The group of individuals representing OCC during a specific State's monitoring process. The Team consists of OCC staff and representatives from OCC's monitoring contractor, WRMA, Inc.  |
| <b>Personally Identifiable Information</b> | As defined in OMB Memorandum M-07-1616, it refers to information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.  |
| <b>State Calls</b>                         | Virtual meetings between the OCC Monitoring Team, the State CCDF administrator(s), and other State staff/partners as identified by the State. Three State-specific calls are held during the Pre-Visit Phase. One or more calls and a Virtual Exit Conference occur during the Post-Visit Phase.   |
| <b>Sub-Cohort</b>                          | The subset of the cohort that has monitoring visits scheduled within the same part of the fiscal year (usually a calendar quarter). For example, States with visits in January, February, and March would be one sub-cohort and would participate in the same Sub-Cohort Training.   |

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### *Commonly Used Acronyms*

| <b>Acronym</b>   | <b>Term</b>                          |
|------------------|--------------------------------------|
| <b>CCDBG</b>     | Child Care & Development Block Grant |
| <b>CCDF</b>      | Child Care & Development Fund        |
| <b>CCR&amp;R</b> | Child Care Resource and Referral     |
| <b>CDC</b>       | Compliance Demonstration Chart       |
| <b>CVT</b>       | Compliance Verification Team         |
| <b>DSC</b>       | Document Submission Chart            |
| <b>FFN</b>       | Family, friend, and neighbor care    |
| <b>OCC</b>       | Office of Child Care                 |
| <b>PII</b>       | Personally Identifiable Information  |
| <b>TA</b>        | Technical Assistance                 |



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## Appendix B: Monitoring Templates and Tools

| Appendix # | Document Name   |
|------------|---|
| B-1        | Office of Child Care (OCC) Monitoring Process: Overview<br>(Available on the Office of Child Care CCDF Federal Onsite Monitoring webpage: <a href="https://www.acf.hhs.gov/occ/policy-guidance/ccdf-monitoring-cycle-2-resources-states">https://www.acf.hhs.gov/occ/policy-guidance/ccdf-monitoring-cycle-2-resources-states</a> ) |
| B-2        | Compliance Demonstration Packet (PDF version)<br>(Available on the Office of Child Care CCDF Federal Onsite Monitoring webpage: <a href="https://www.acf.hhs.gov/occ/policy-guidance/ccdf-monitoring-cycle-2-resources-states">https://www.acf.hhs.gov/occ/policy-guidance/ccdf-monitoring-cycle-2-resources-states</a> )           |
| B-3        | State-Specific Monitoring Activities (template)   |
| B-4        | General Onsite Visit Schedule Structure   |
| B-5        | Virtual Monitoring Visits Due to Emergency<br>(Available on the Office of Child Care CCDF Federal Onsite Monitoring webpage: <a href="https://www.acf.hhs.gov/occ/policy-guidance/ccdf-monitoring-cycle-2-resources-states">https://www.acf.hhs.gov/occ/policy-guidance/ccdf-monitoring-cycle-2-resources-states</a> )              |

### Trainings

Note that OCC Monitoring Process Trainings are available via the OCC webpage, *CCDF Monitoring Cycle 2 Resources for States*: <https://www.acf.hhs.gov/occ/policy-guidance/ccdf-monitoring-cycle-2-resources-states>